

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA;
COMMONWEALTH OF
MASSACHUSETTS; STATE OF NEW
JERSEY; STATE OF COLORADO; STATE
OF ILLINOIS; STATE OF MARYLAND;
STATE OF NEW YORK; and STATE OF
WISCONSIN

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION;
DENISE CARTER, in her official capacity
as former Acting Secretary of Education; and
LINDA MCMAHON, in her official capacity
as Secretary of Education,

Defendants.

Case No. 1:25-cv-10548

PLAINTIFF STATES' MOTION FOR LEAVE TO SUBMIT SUPPLEMENTAL FILING

In light of the Supreme Court's decision today, Plaintiff States respectfully request permission to submit a supplemental filing by no later than Thursday, April 10, 2025, addressing the matters raised by the Supreme Court's decision.

Dated: April 4, 2025

Respectfully submitted,

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**admitted pro hac vice*

†motion for admission pro hac vice forthcoming

LOCAL RULE 7.1 CERTIFICATE

I, Megan Barriger certify that on April 4, 2025, I contacted counsel for Defendants, Michael Fitzgerald, by telephone. Defendants were unable to provide their position on this Motion prior to filing.

/s/ Megan Barriger
Megan Barriger (BBO #687707)
Assistant Attorney General

Dated: April 4, 2025

CERTIFICATE OF SERVICE

Counsel for Plaintiff States certify that they have submitted the foregoing document with the clerk of court of the District of Massachusetts, using the electronic case filing system of the Court. Counsel for Plaintiff States hereby certify that they have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Megan Barriger
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Assistant Attorney General

Dated: April 4, 2025